

COMMISSION ACTION

NCPC File Nos. 1303/6152



WASHINGTON MONUMENT GROUNDS
REVISED DEVELOPMENT CONCEPT PLAN AND PRELIMINARY SITE AND BUILDING
PLANS FOR VISITOR AND SECURITY IMPROVEMENTS
Between 14th and 17th Streets, NW and Constitution Avenue, NW and the Tidal Basin
Washington, DC

Submission by the National Park Service

January 9, 2003

Commission Action Requested by Applicant

Approval of the Revised Development Concept Plan and Preliminary Site and Building Plans pursuant to 40 U.S. C. § 8772(d) and Section 5 of the National Capital Planning Act of 1952, as amended (40 U.S. C. §8722(b)(1)).

Commission Action

The Commission approves:

- The Revised Development Concept Plan and reaffirm the approval of the concept of the underground Visitor Facility and Concourse to the Monument.
- The Preliminary Site and Building Plans for the landscape plan, retaining walls and paths and the monument plaza.
- The concept of an addition on the west façade of the lodge of a size sufficient to meet the National Park Service's needs without overwhelming the lodge and suggest that NPS provide two or more alternative designs.

Deborah B. Young
Secretary to the National Capital Planning Commission

STAFF RECOMMENDATION

NWitherell

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Submission by the National Park Service

January 2, 2003

Abstract

The National Park Service (NPS) has requested approval of the Revised Development Concept Plan for the Washington Monument Grounds and approval of Preliminary Site and Building Plans for an underground visitors facility and security improvements. The Revised Development Concept Plan (DCP) is intended to update the 1993 Development Concept Plan for the Washington Monument and Grounds, which provided for an underground visitors center entered through the Monument Lodge (without an addition) and site improvements.

In February 2002, the Commission approved a concept design for visitor and security improvements at the monument. The approved concept included a system of retaining walls and paths, an underground visitors facility entered through the lodge and connected to the monument via an underground passage, and a skylight as part of the landscape plan.

In April 2002, the Commission approved in concept the construction of an addition to the lodge, although it did not approve a design for the addition. The addition contained stairs to the underground visitors facility and passage. The Commission specifically requested that, "Any addition to the Monument Lodge be compatible in style and historic character with the lodge and designed in a manner that results in a structure that is not visually larger than the existing lodge, so as to not dominate the scale and massing of this historic building."

Since last April, NPS has determined that the visitor screening procedure must be moved from the below-grade facility to the surface of the grounds. This program change in the security requirements has led to a proposed addition to the lodge that is significantly larger than that anticipated by the Commission in April. It now contains the screening machines, wandering areas, two elevators, and the stair.

Staff recommends that the Commission approve the Revised Development Concept Plan and the preliminary site and building plans, including the landscape plan, the vehicle barrier plan, and the alterations to the Monument Plaza, *except for* the addition, the skylight, the below-grade

visitors facility, and the underground tunnel because the submission reflects a program for the addition to the lodge that is significantly different from the concept approved by the Commission last April. The augmented program has led to a proposed addition that is significantly larger than the approved addition and one that, in staff's judgment, "dominate[s] the scale and massing of this historic building."

As the skylight, underground visitors facility and tunnel are interrelated with the program and visitor experience and the procession to enter the monument, staff recommends that review and approval of these elements be considered in the context of the new below- and above-grade program requirements and plans once the preliminary design is consistent with the Commission's prior approvals.

Staff does, however, support the approval of the other elements of the Revised Development Concept Plan, as well as the advancement to preliminary design approval for the landscaping plan, the walls and paths of the vehicle barrier system, and the Monument Plaza design features.

Commission Action Requested by Applicant

Approval of the Revised Development Concept Plan and Preliminary Site and Building Plans pursuant to 40 U.S. C. § 8772(d) and Section 5 of the National Capital Planning Act of 1952, as amended (40 U.S. C. §8722(b)(1))

Executive Director's Recommendation

The Commission:

Approves:

- The Revised Development Concept Plan for the Washington Monument Grounds, between 14th and 17th Streets and Constitution Avenue, NW and the Tidal Basin, Washington, DC, as shown on NCPC Map File No. 1.42(05.17)-41112, **except for:**
 - The addition to the lodge;
 - The skylight;
 - The below-grade visitors facility; and
 - The underground passage to the monument.
- That portion of the Preliminary Site and Building Plans for Visitor and Security Improvements, Washington Monument Grounds, between 14th and 17th Streets and Constitution Avenue, NW and the Tidal Basin, Washington, DC, as shown on NCPC Map File No. 1.42(73.10)-41131, that includes the landscape plan, including the retaining walls and paths serving as vehicle barriers; and the redesign of the Monument Plaza.

Excepts from approval:

- That portion of the Preliminary Site and Building Plans that includes the addition to the lodge, because it reflects a more stringent security program and is therefore significantly different than the concept approved by the Commission in April 2002, and because it does not meet the request of the Commission for a compatible lodge addition that “is not visually larger than the existing lodge;”
- The skylight, which is related to the design and location of the lodge addition and should be reviewed in that context;
- The below-grade visitors facility and the underground passage, which are interrelated with the entrance program and visitors’ experience and procession into the monument through the Lodge. Further, the visitors’ entry into the addition, through the security checkpoint, then into the facility and concourse below, and finally into the monument itself, is a progressive experience. Until the above-grade functions are redesigned so as to be compatible with the existing lodge, approval of these sequential elements cannot progress beyond the approved concept level.

Notes that because of more stringent security requirements since the Commission reviewed the project in April 2002, the program has changed significantly for the lodge, the lodge addition, the skylight, the below-grade visitor facility, and the underground passage to the monument. The currently proposed addition is too large in relation to the lodge in size, scale, and footprint. As a result, it is incompatible with the lodge and intrudes on the historic landscape. The location of visitor screening and access to the below-grade areas are interrelated in location, program, and design. The appropriate design solution must successfully address all aspects of the project. The addition as now proposed is a new concept that does not represent any advancement in its original design. Rather, the program has changed and expanded to incorporate the relocation of the security and screening functions into the addition from the below-grade visitors facility.

Requests that, prior to resubmission of Preliminary Site and Building Plans, the National Park Service:

- Explore alternate ways of gaining access to an underground visitors facility, such as a separate entrance structure; a landscape entrance; smaller separate structures near the lodge that would provide entry, screening, and some visitor services; or a reconfiguration of the screening and elevator/stairway functions into one or more additions to the lodge that would be more compatible in design and size than that currently proposed.
- Update and provide for Commission review the new program requirements, concept plans and drawings for the above and below ground facilities.

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BACKGROUND AND STAFF EVALUATION

DESCRIPTION OF PROPOSAL

The NPS has submitted both a revised design concept plan for the Washington Monument Grounds, and preliminary site and building plans for visitor and security improvements at the Washington Monument Grounds, including the rehabilitation of the lodge, an addition to the lodge that will house security screening and access to an underground visitor facility; an underground passage to a below-grade entrance to the monument; alterations to the Monument Plaza; as well as vehicular security barriers in the form of retaining walls on the grounds.

The proposed action is intended to improve the current appearance of the grounds and visitor movement and security. NPS's goals include keeping the monument open for visitors, improving visitor services, protecting the monument from security threats, retaining recreational use of the grounds, preserving the structural integrity of the monument, and preserving the significant character and features of the landscape. The proposal includes the visitor facility called for in the 1993 Development Concept Plan. The proposal updates the 1993 plan to include the provision of security measures.

Site

The Washington Monument Grounds occupy 73 acres at the cross-axis of the National Mall. The Monument Grounds are bounded on the north by Constitution Avenue, on the south by the Tidal Basin and Independence Avenue, on the east by 14th Street, and on the west by 17th Street.

Development Concept Plan

The Development Concept Plan approved by the Commission in 1993 provided for:

- The removal of the parking lot, south of Constitution Avenue, on the Monument Grounds;
- Completion of the German-American Friendship Garden adjacent to the sidewalk on the south side of Constitution Avenue;
- The realignment of 15th Street and the provision of two passenger drop-off areas;
- Tourmobile stops along Jefferson and Madison Drives with associated concession kiosks;
- Additional tree plantings;
- Retention of the Sylvan Theater and Ranger Station;
- Paths leading to the monument;

- The provision of an underground visitors facility using the lodge as the entrance;
- A redesigned Monument Plaza.

The *Revised* Development Concept Plan now submitted includes the same general development concepts mentioned in the 1993 plan, with the addition of:

- Vehicle barriers in the form of low retaining walls and a redesigned pathway system;
- An addition to the lodge, to contain both the visitor screening apparatus and the staircase to the underground facility;
- A skylight over the visitors facility;
- An underground passage to a new below-grade entrance to the monument.

The depiction of NPS's submitted Revised Development Concept Plan is dated June 2002 and has not been updated to include the new requirement for visitor screening at grade or the removal of this function from the below-grade visitors facility.

Retaining Walls / Vehicle Barriers

The retaining walls would be 30-inch-high reinforced concrete, backed by the solid earth of the slope, clad with rough split granite, and finished with a two-foot-wide granite cap. The base of the wall would be extended approximately 20 inches to provide a curb or footrest. The walls would be located at the base of the mound, approximately 400 feet from the monument. Built at an accessible grade, they would direct pedestrians around the grounds in gentle arcs up the slope and toward the monument. Operable bollards at points along the paths would allow service and emergency vehicles access to the monument.

The retaining walls would be screened from distant views from the west by the creation of a slight rise in the grading of the lawn between the wall and 17th Street. The lodge itself would screen some of the views of the paths from the east. From other views, particularly from the north and south, the retaining walls would become a visible landscape feature of the Monument Grounds.

The monument sits upon a broad, somewhat irregular grassy knoll consisting, in part, of imported fill. The existing paths leading to the monument from the east do not meet accessibility standards; the proposed pathways and some regrading would result in a subtle reshaping of the knoll. Some irregularity of the slope from north to south and from east to west would be retained. The Jefferson Pier (a stone marker) and the land immediately around it would not be disturbed.

Landscaping

The proposed landscape plan would retain the acres devoted to recreation and events while replenishing and adding trees along the perimeter. NPS has stated that the new plantings will be based on study of historic landscape precedents for plantings at the site.

Monument Plaza

The plaza at the base of the monument would be repaved with granite. The fifty flagpoles and flags would remain at the outer perimeter of the plaza. Curved backless marble benches would be installed at the outer circumference. An exit hatch to an emergency stair from the new below-grade passageway facility would be incorporated into the paving on the east side of the plaza.

Monument Lodge and Proposed Addition – Visitor Entrance and Screening

The lodge, a significant historic feature of the grounds, was completed when the monument opened in 1889. It was built by the Monument Society and once served as a waiting room for visitors. It represents the aspirations of Thomas L. Casey, the engineer who completed the monument, the Monument Society, and the era of the monument's completion. Its position on the long Mall axis and its architecturally prominent entrance complement the obelisk. Architecturally and symbolically, it is a portal to the monument. Its character has long been obscured by the food service addition. In the proposal, the lodge would be rehabilitated and would contain a ranger information station and an office for Park Police.

In April 2002, the Commission approved the concept, but not the design, of an addition to the lodge to contain the stairway to the below-grade facility. That addition proposed a single mass, stepped in profile. At approximately 1400 square feet, it was larger than the lodge (approximately 1000 square feet), but it did not extend beyond the side elevations of the lodge and was set farther away from the west elevation of the lodge.

The currently proposed addition, at approximately 2700 square feet, is almost twice the size of the approved concept for the addition in square feet. It is 2 ½ times the size of the footprint and the length of the lodge itself, because it now also houses the screening function and two elevators. The shape of the glass addition is now two distinct masses—a hyphen-shaped form extending westward from the lodge that contains the security apparatus, and a five-sided form above the elevators and stairs. The base of the addition is finished in stone in reference to the lodge.

Underground Visitors Facility

A skylight approximately 60 feet in length would bring natural light into the visitors facility over the exhibit area. The size has been reduced from the 90-foot skylight the Commission approved in concept last spring. Of the 90-foot length, the glass would be reduced from approximately 70 feet to 60 feet, and the hatch for the east end emergency exit stairs and the mechanical grilles would be relocated to the ground to either side of the lodge addition.

The underground visitors facility would provide space for visitor queuing, ticketing, restrooms, an exhibit area, and a bookshop (now housed inside the monument). Food sales are not anticipated. For security reasons, a connecting passage would direct screened visitors directly from the underground center to a new, below-grade lobby of the monument. The passage would enter through the foundations on the east side of the monument. Visitors would no longer enter the monument from the plaza and the east door of the obelisk.

PREVIOUS COMMISSION ACTION

At its April 4, 2002 meeting, the Commission:

- **Approved** the concept, but not the design, of an addition to the Washington Monument Lodge. [In February 2002 the Commission had approved, in concept, the landscape plan, including the wall and path system, the skylight, the underground visitors facility with screening below grade, and a below-grade passage to the monument.]
- **Reiterated** its request from its February 7, 2002 meeting that, **prior to** submitting preliminary site and building plans, NPS should submit a Revised Development Concept Plan incorporating proposed changes and additions to the currently approved Plan of 1993, a completed National Environmental Policy Act document, and a record of significant progress in the Section 106 historic preservation consultation with all parties.
- **Requested** that:
 - Prior to advancing the design of the underground visitor center or the associated above ground addition to the Monument Lodge, NPS complete a study of anticipated visitor circulation patterns to determine necessary queuing and program space, and stairway, entry and exit capacity of the underground visitor center. This study should be included with the Revised Development Concept Plan for the Washington Monument Grounds.
 - Any addition to the Monument Lodge be compatible in style and historic character to the Lodge and designed in a manner that results in a structure that is not visually larger than the existing Lodge, so as to not dominate the scale and massing of this historic building.

CONSULTATION / RESPONSE TO PREVIOUS COMMISSION ACTION

Following the Commission Action at its April 4, 2002 meeting, NPS has undertaken several initiatives.

- A revised development concept for the Washington Monument Grounds was prepared in June 2002 that highlights the modifications and refinements that have been made as a result of new security mandates since September 11, 2001. However, the submitted Development Concept Plan continues to show security screening in the below-grade facility and must be updated with the next submission.
- The Revised Development Concept Plan examined visitor and tourist movements, taking into account new features such as the World War II Memorial. NPS has determined that visitor movement will continue to flow in an east/west direction, as it did at the time of the 1993 plan for the Monument Grounds.
- NPS briefed Commission staff regarding the operation of the underground visitors center, including general information about visitor queuing, circulation patterns, entry and egress, and the capacity of the visitors' center.
- After releasing an Environmental Assessment for public comment, the National Park Service issued a Finding of No Significant Impact (FONSI) pursuant to the National Environmental Policy Act on July 22, 2002. NCPC issued its FONSI on December 16, 2002. Its finding is summarized below.
- A Programmatic Agreement (PA) was signed to facilitate the requirements of Section 106 of the National Historic Preservation Act. NPS is in the process of fulfilling its responsibilities under the Act and the requirements pursuant to the PA, including the development of a Cultural Landscape Report (CLR) and a Historic Structures Report (HSR) on the lodge. The reports will be used by NPS in the management and treatment of the site. The reports will also assist NPS and others in determining the effect of the proposal on the contributing elements of the monument and its surroundings.
- In July 2002 NPS developed preliminary determinations about the effects of the project. NPS must make documented and informed determinations about the significance of the resources, in consultation with all parties and the District of Columbia State Historic Preservation Office (DC SHPO), which will formally respond as the project is developed further. NPS must analyze the research information sufficiently to document its determinations prior to the development of final site and building plans.

EVALUATION

REVISED DEVELOPMENT CONCEPT PLAN

The Revised Development Concept Plan incorporates the features called for in the 1993 development concept to improve the Monument Grounds and the visitor experience. The additional features in the 2003 concept plan include the system of retaining walls and paths that provide a vehicle barrier, the addition to the lodge, the above-grade visitor screening in the lodge addition, a skylight, and the elimination of the east door of the monument as an entrance. Rather,

all visitors to the monument will be directed to a lower-level entrance in the monument through a below-grade passage from the visitors facility.

Staff recommends approval of the Revised Development Concept Plan for the historic Washington Monument Grounds, including the landscape plan with the retaining walls and paths, and the alterations to the Monument Plaza, *with the exception of the lodge addition, the skylight, the below-grade visitors facility, and the underground passage.*

The current program for the Revised Development Concept Plan is significantly different from that anticipated by the Commission when it approved the project in concept last February and April. The addition approved in concept in April 2002 was to be “designed in a manner that results in a structure that is not visually larger than the existing lodge, so as to not dominate the scale and massing of this historic building.” The program has changed and grown to incorporate the relocation of the security and screening functions to the addition from the underground facility. As a result of the more stringent security requirements, the proposed addition, now 2 ½ times the size of the lodge, visually overpowers and is incompatible with the lodge in its massing, size, and scale.

The below-grade facility and passage to the monument are interrelated with the entrance addition. Visitors’ entry into the lodge and their progression into the addition, through the security checkpoint, then into the facility and passage below, and finally into the monument itself, is a successive and paramount experience. Until the above-grade functions are redesigned so as to be compatible with the lodge, and, furthermore, until information to review the new under- and above-grade program requirements is finalized and submitted for review, staff does not recommend conferring further approval of these elements of the Revised Development Concept Plan at this time.

PRELIMINARY SITE AND BUILDING PLANS

Retaining Walls and Paths

The walls provide protection from vehicle assaults as well as full accessibility. Staff considers this landscape solution acceptable because an effective stand-off distance would be established for potential vehicle assaults. A fully accessible pedestrian pathway system would be combined with the retaining walls. The proposed wall/pathway system would provide an acceptable union of open recreation areas, security, and seating walls. Although the low retaining walls would be visible, they would be relatively subtle in character, given their purpose, and would have a minor effect on the openness of the greensward of the Monument Grounds. The rise of the grassy slope, including some of the irregularity of grade, would be retained, and the major portion of the site would be untouched by security barriers.

Staff finds that this element of the landscape plan can be judged and approved independently of the entrance and underground elements. Staff recommends preliminary approval of the retaining walls and the associated paths.

Landscape Plan

Staff recommends preliminary approval of the landscape plan. Prior to developing the final landscape plan, NPS must document its study of historic planting plans for the grounds and how it reached its decision to use or deviate from those plans.

Staff is concerned with the absence of an irrigation scheme on the plans. The condition of the grass on the Monument Grounds is poor. Since there will be re-grading and construction of the retaining walls, staff strongly suggests that this would be an opportune time to incorporate an irrigation system to ensure that the grass can be maintained appropriately.

Monument Plaza

The pattern of concentric circles, if the granite is carefully selected, will complement the simplicity of the obelisk. The proposed marble benches are a welcome change. The flagpoles would remain.

Staff recommends preliminary approval of the plaza alterations, with the understanding that further design and material details will be developed for the final submission.

Monument Lodge and Addition – Entrance and Visitor Screening

In the 1993 Development Concept Plan, the lodge was to be used as the entrance, without an addition. In April 2002, the Commission approved the concept, although not the design, of an addition to the lodge approximately 1400 square feet in size that contained the stairway descending to the below-grade screening and visitors facility.

Since the Commission approval in April 2002, the security requirements have become more stringent and the program for the addition more complex. This is the first submission the Commission has reviewed with the screening facility above grade. NPS has determined that the screening at the monument and at selected other NPS sites around the nation must occur before visitors are allowed to progress to interpretive or other visitor services areas. Therefore, the screening function has moved to the surface of the grounds and consequently into a larger addition that, at approximately 2700 square feet, is almost twice the size of the approved concept. The lodge would continue to serve as the entrance to the visitors facility and the monument.

The lodge is a significant historic and architectural element of the Monument Grounds. The design of the lodge addition is now burdened with the additional requirements of the visitor screening apparatus (two metal detectors, two magnetometers, and wandering areas for Park Police) plus the two elevators previously programmed for the lodge but now required to be beyond the screening area.

In April, the commission specifically requested that “any addition to the Monument Lodge be compatible in style and historic character to the lodge and designed in a manner that results in a

structure that is not visually larger than the existing lodge, so as to not dominate the scale and massing of this historic building.”

In staff’s opinion, a satisfactory resolution to this program and design has not yet been achieved. With the new program requirements, the addition’s scale, massing and footprint overwhelm the lodge. The proportional and stylistic relationship of the addition to the lodge is awkward. The proposed length of the addition is two-and-one-half times the depth of the lodge (excluding its rear bay). The footprint is also 2 ½ times the size of the lodge. Further, the staff finds the combination of forms (the hyphen with the security screening, and the five-sided form with glass walls sloped at 45-degree angles to the ground) to be unnecessarily complex and stylized.

In both elevation and in footprint, the expression of the addition is not compatible with the style, scale, and character of the lodge. In staff’s opinion, the addition does not meet the Secretary of the Interior’s Standards for Rehabilitation for this reason. NPS should continue to seek an acceptable design for an entrance element that is compatible with the lodge and with the historic landscape.

Staff has sought to explore with NPS alternative approaches to the present design and program. NPS remains committed to its program, which includes use of the lodge with an addition for visitor screening and as the entrance to the visitor facility. As an alternative to a large addition at the rear of the lodge facing the Monument Grounds, staff recommends that other possible schemes be explored that may or may not include the following (see attached diagrams on page 24-25): a separate entry structure at the rear of the lodge; two smaller additions connected to the sides (north and south elevations) of the lodge; separate entry structures to either side of the lodge; multiple small structures alongside the lodge; a structure wrapping around part of the lodge; or two smaller structures to the east of the lodge on 15th Street, at the edge of the Monument Grounds.

The addition as now proposed is a new concept that does not represent an advancement of its original design. Staff recommends that the proposed addition to the lodge be excepted from preliminary approval.

Staff also recommends that the proposed skylight be excepted from preliminary approval, as its form and location are related to the lodge, the addition, and the setting. Although it has been reduced in size and the hatch and mechanical grilles relocated, staff finds it still will have too big an impact on the grounds, especially in addition to the lodge addition. No decision should be reached until the nature of the visitors facility is determined.

Underground Visitors Facility and Passage to Monument

The staff recommends that the below-grade visitors facility and the underground passage be excepted from preliminary approval because: 1) NPS has not submitted sufficient information for the Commission to review the program, location and design at the preliminary level; 2) what NPS has developed since the April concept approval is not consistent with the current program requirements and what is underground has not been reprogrammed; 3) NPS’s renderings, which are intended to provide information about the design, absent complete plans, are outdated and

show a design and program that are no longer accurate; and finally, 4) these elements are interrelated with the entry and procession through the lodge and into the monument.

Until the above-grade functions are redesigned so as to be compatible with the lodge and until the information to review the new under- and above-grade program requirements are finalized and submitted for review, staff does not recommend advancing these elements beyond the original concept phase.

COORDINATION

Coordinating Committee

The Coordinating Committee reviewed this item at its meeting on June 12, 2002, and forwarded the proposal to the Commission with the statement that the project had been coordinated with all agencies participating. The participating agencies were NCPC; the District of Columbia Office of Planning; the Department of Housing and Community Development; the Department of Transportation; the General Services Administration; the National Park Service; and the Washington Metropolitan Area Transit Authority.

Commission of Fine Arts

The most recent letter from the Commission of Fine Arts (CFA), dated October 4, 2002, is attached. CFA reviewed an earlier design proposal that combined the lodge addition and skylight in one structure. That proposal contained, for the first time, the visitor screening function in the lodge addition above grade.

The project has been reviewed at CFA's meetings of December 20, 2001, February 21, 2002, May 16, 2002, and September 18, 2002 meetings.

CONFORMANCE

Comprehensive Plan

The proposed security improvements include the replacement of the temporary circle of jersey barriers surrounding the monument with a sequence of 30-inch-high, segmented walls of reinforced concrete with walkway space for pedestrians.

As the Washington Monument Grounds are part of the Mall Complex, an applicable policy in the Parks Open Space and natural Features Element of the Comprehensive Plan specifies:

The great cross-axes of the Mall Complex, from the Capitol to the Lincoln Memorial and from the White House to the Jefferson Memorial, are a unique national space—they are a summary of democratic ideals and achievement that must be protected from inappropriate development. The Mall should be considered complete, and any improvements necessary

in this area should be limited in scope and sensitively designed to reinforce the integrity of the Mall Complex.

The proposed security improvements would also include changes to the existing Monument Lodge in order to conveniently accommodate visitors. Two additional policies in the Preservation and Historic Features Element of the Comprehensive Plan applicable to the proposal state:

New Construction on Historic landmarks or in Historic Districts should be compatible with the historical architectural character and cultural heritage of the landmark or district. In design, height, proportion, mass, configuration, building materials, texture, color and location, new construction should complement these valuable features of the landmark or district, particularly features in the immediate vicinity to which the new construction will be visually related.

The proposed improvements would provide essential safety measures for the protection of the historic obelisk and, at the same time, significantly reduce the visibility of needed barriers.

National Historic Preservation Act

Consultation under the terms of the Programmatic Agreement (PA) is still underway, as it frequently is at the preliminary stage of review by the Commission. The discussions on the various elements of the proposal have not yet led to definitive conclusions about the effects of the proposal on the historic character of the historic property and about conformance with the Secretary's Standards. These conclusions must be reached during the development of final site and building plans in order for the terms of the PA to be met.

The PA describes the procedures for the historic preservation consultation, the requirements for the type of information to be disseminated, and the basis for the consultation, which is to take into account the effects of the proposal on the National Register qualities of the monument and its grounds and of adjacent historic properties. The effects are considered by determining if the proposal is in conformance with the Secretary of the Interior's Standards for Rehabilitation. NPS is obligated to take the Secretary's Standards into account throughout the development of the proposal, and to consult with, and consider the views of, the parties to the PA (and of the public at large), particularly at established points during the development of the proposal.

All signatory agencies and the consulting parties have been actively engaged in reviewing iterations of the proposal by commenting and suggesting possible alternatives to mitigate or avoid possible effects. These comments have been made during the consultation meetings established by the PA, and also in additional meetings, including some on site. Many of the consulting parties commented in writing on the Environmental Assessment.

The consultation meeting among the PA parties for the current submission was held on December 12, 2002. Topics included the design of the addition, the nature and program of the underground facility, and the engineering reports, including the peer report, on the safety of the

proposed excavation for the passage. The Commission's response to the proposal at the January 9, 2003 meeting constitutes a contribution to the consultation process.

NPS has provided initial research information to the parties to inaugurate discussion of NPS's proposal and of alternatives. This information includes some historical background and preliminary assessments by NPS staff about the cultural landscape and the Monument Lodge, as required in the PA. The reports (the Cultural Landscape Report and the Historic Structures Report) will not be completed for some months. NPS has disseminated some information about the historic landscape and lodge.

The further and more detailed evaluation by NPS staff of research information as it becomes available is crucial to advancing the consultation. NPS should swiftly pursue its own professional evaluation of the research gathered to date, and assess the National Register characteristics of the historic resources. This information should be shared with the DC SHPO and the other parties. In this way, NPS will speed its own process of internal as well as external review, while meeting the terms of the PA.

National Environmental Policy Act

Pursuant to the regulations implementing the National Environmental Policy Act (NEPA), the NPS prepared an Environmental Assessment for the proposed action of improving permanent security for the Washington Monument. NPS completed a NEPA decision process culminating in a Finding of No Significant Impact on July 22, 2002.

NCPC staff has analyzed, in conformance with the requirements of NEPA, the prepared Environmental Assessment (EA) completed by NPS. Staff has recommended adoption of the EA and prepared a Finding of No Significant Impact based on the EA in accordance with the provisions of the NEPA regulations issued by the Council on Environmental Quality (40 CFR, 1500-1508).

The EA reviews two alternatives for developing security measures at the monument as follows:

- Alternative A (Below-Grade Alternative);
- Alternative B (Above-Grade Alternative)

A third alternative is the "No Action" alternative specified for NEPA evaluation as Alternative C in the EA and is required as a baseline comparison by the Council on Environmental Quality.

- **Alternative A** (Below-Grade Alternative) includes an underground screening facility and a below-grade passageway to the monument. A landscape vehicle barrier system of walled terraces and pathways would be developed at the ground level around the monument. The Monument Lodge would be rehabilitated as the portal to a new underground visitor screening facility that would include a ticketing/lobby area, an educational and interpretive area, and other visitor services. A skylight would be installed to allow light into the screening facility and preserve a visual connection to the monument for users.

In Alternative A, a system of walled terraces 24 to 30 inches high around the monument would provide a barrier system for stopping moving vehicles. This system would replace the concrete jersey vehicle barriers. A berm, set back approximately 50 feet from the wall west of the monument, would be used to screen the wall from the west. The existing surface grade of the turf surrounding the monument would be re-graded to achieve a more uniform slope from various directions. Alternative A also includes improvements to the Washington Monument Grounds involving replacement of concrete at the monument base plaza with high-quality pavers and benches. Both the plaza and site walkways would be reconfigured for easier pedestrian flow and would be more accessible for persons with physical disabilities.

The parking lot at 16th Street would be removed, which would allow the German-American Friendship Garden to be completed. The landscape would be augmented with new trees along the primary streets and other locations on the Grounds.

- **Alternative B** (Above-Grade Alternative) includes a visitor screening facility located above ground near the Sylvan Theater, away from the primary views and vistas. This new facility would replace the existing above-ground visitor queuing area around the perimeter of the Monument Plaza, the existing visitor screening facility located in a temporary building on the plaza immediately adjacent to the eastern side of the monument, and the existing ticket distribution kiosk on the west side of 15th Street at Madison Drive. The new screening facility would consist of two buildings clustered in a less visible and less used part of the Grounds. The buildings would include ticketing and security procedures, an educational and interpretative display, and other visitor services. After visitors are screened, law enforcement personnel would escort the visitor groups in an above-ground, double-fenced security pathway to a double-locked door to be installed at the entrance to the monument.

Under Alternative B, security bollards would be placed at the 1.25-mile-long perimeter of the Monument Grounds to provide a barrier system to stop moving vehicles—these bollards would replace the existing jersey barriers on the Washington Monument Grounds. Alternative B would also include restoration of the Monument Lodge and improvements to the Washington Monument Grounds. The asphalt paving at the plaza would be replaced with grass and a low granite wall. The parking lot at 16th Street would be removed, which would allow the German-American Friendship Garden to be completed.

- **Alternative C** (No Action Alternative) would retain the existing structures and elements of the Washington Monument Grounds in their existing use and condition. There would be no new development or reconfiguration of facilities. Specifically, the No Action Alternative does not involve a return to a previous condition, but involves the continued use of existing temporary measures for monument security, visitor screening and access, and vehicle barriers. The existing security system, which consists of NPS and U.S. Park Police personnel identifying, grouping, and isolating ticketed tour members in the plaza around the monument, would continue under the No Action Alternative. At designated times, groups would undergo screening in the interim structure located adjacent to the base of the monument. The existing temporary jersey barrier system would remain and be visible on the Monument Grounds and from West Potomac Park, the Ellipse, and the National Mall. Therefore, implementation of the

No Action Alternative would necessitate further efforts to find a suitable replacement for the concrete jersey barriers.

Under the No Action Alternative, paths on the Monument Grounds would remain unimproved in their current locations. The parking lot on the northern portion of the Grounds at 16th Street would remain and the German-American Friendship Garden would not be completed.

The preferred alternative and proposed action specified by NPS is alternative A. The Commission staff has reviewed the EA analysis and concludes the environmental effects for alternative A have minimal impacts on environmental attributes of the immediate site area of the Washington Monument. Important visual effects are essential in comparing the various alternatives and would be addressed through design mitigation actions. Consequently, NCPC staff has concluded the proposed project does not require an environmental impact statement, pursuant to NEPA. This opinion has been arrived at in considering not only the NPS developed EA but also the subsurface investigation information compiled by NPS project consultants in May 2002.

Environmental Review Conclusions

NCPC staff with delegated authority from the Commission and acting in accordance with NEPA has developed a Finding of No Significant Impact (FONSI). Construction and operation of the Washington Monument permanent security measures would not have a significant adverse impact on the natural environment, socio-cultural resources, transportation, parking, or utilities systems. Construction activities would have minor adverse effects on noise, the visual environment, vehicular traffic, pedestrian traffic, and parking; however, these effects would be of short duration and would not result in long-term effects on resources.

In the context of furthering design mitigation, NPS should address the following site design implementation measures:

- Soil modification to balance any Monument Grounds soil density (if required) should be carefully reviewed to determine any adverse erosion coefficient change. Soil erosion challenges are often overlooked in soil modification and can lead to detrimental maintenance issues.
- Full remediation of all discovered contaminated soils in compliance with the District of Columbia Department of Consumer and Regulatory Affairs and the District of Columbia Department of Health.

Cumulative Effects of the Action

Cumulative impacts of the proposed security improvements at the Washington Monument Grounds and the ongoing or proposed projects in the vicinity of the Grounds are minimal. Upon assessment of the potential cumulative effects associated with the development of Alternative A or Alternative B at the Monument Grounds, it was determined that limited effects involve geophysical resources, visual resources, and the visitor experience.

- The topography and soils that can be attributed to either Alternative A or Alternative B would not be adversely disturbed by other projects in the general area. The geology of the Monument Grounds would not be affected by development under Alternative A or B. Several ongoing and proposed projects have been identified in the vicinity of the Washington Monument Grounds that could potentially involve temporary dewatering; however, the NPS plans at the Grounds under Alternative A or B would not require dewatering and would not contribute to cumulative effects on groundwater. Overall, there would not be cumulative impacts on geophysical resources resulting from the proposed NPS action.
- The proposed improvements to the visual environment of the Monument Grounds under Alternative A would include the replacement of the temporary security measures on the Grounds with attractive landscape treatments and terraces, removal of the 16th Street parking lot, removal of the incompatible addition to the Monument Lodge, and the completion of the German-American Friendship Garden. These changes would contribute to other improvements in the landscape around the Grounds resulting in a limited cumulative impact to visual resources.
- Development of Alternative B would have visual impacts due to proposed features such as the perimeter bollards and the double-fenced security pathway containing a glass-like barrier. The impact's adverse qualities would be somewhat offset by the removal of the temporary security measures from the Grounds, and the removal of the 16th Street parking lot on the Grounds, but by their nature is incongruent with other existing features. Alternative B would have a negative visual impact on the monument and grounds, and a minor cumulative effect on visual resources in the vicinity of the Monument Grounds.
- With the development of either Alternative A or Alternative B, existing tours and interpretive opportunities would continue to be available to the public at the monument and at nearby museums and memorials. Under Alternative A, the proposed underground screening facility and landscape security improvements would develop a visitor experience through careful and appropriate design implementation. Potential adverse impacts for some visitors from accessing the monument through an underground facility would be mitigated by the added benefits of new facilities, protection from the elements, and added interpretive functions. Alternative B also provides the benefits of new facilities and added interpretive functions, but does involve a minor increase in access distance to achieve the tour of the monument interior and exposes the tour participants to weather.
- Development of Alternative A or Alternative B would have effects that would not contribute to cumulative impacts on water resources, vegetation, hazardous materials, air quality, noise, land use, recreation, or transportation aspects of the Monumental Core.

Mitigation Identified in the EA

Mitigation actions proposed in the EA to accomplish the project are listed according to the attribute resource potentially affected:

Soil and Geotechnical Resources

In compliance with the Department of Consumer and Regulatory Affairs (DCRA) permitting regulations, and the *1987 Standards for Soil Erosion and Sediment Control*, erosion and sediment control measures will be implemented to avoid or minimize the potential for sedimentation and contamination impacts to surface waters due to development of the proposed project.

- To reduce the potential for erosion, and to accelerate the reestablishment of vegetation, disturbed or denuded areas will be re-vegetated upon completion of construction operations.
- To further reduce the potential for sedimentation and contamination impacts to surface waters, proposed impervious surface features such as walking paths will be designed to minimize surface area to the extent practicable.
- Extensive and detailed geotechnical investigations and calculations are being undertaken prior to initiation of construction. Cut and fill amounts will be balanced to minimize the need for import or export of soil.
- To minimize the potential for compression in the clay substrate of the monument, the cut and fill of soil will be designed and implemented to result in no substantial net change in soil loads surrounding the monument. Structural additions to the Grounds will be designed to result in no net change in localized soil loads during construction or operation of the facilities.

Surface Water

- The existing materials storage for the Corps of Engineer's flood control plan will not be disturbed or removed during construction or operation of the proposed development.
- To further reduce the potential for stormwater drainage impacts to surface waters, all proposed impervious surface features, such as walking paths, will be designed to minimize surface area.

Vegetation Resources

- During construction, heavy equipment will be strictly confined to areas of proposed development to limit the disturbance of vegetation to the minimum necessary to meet project objectives.

- To reduce the potential for erosion, and to accelerate the reestablishment of vegetation, disturbed or denuded areas will be re-vegetated upon completion of construction operations.

Hazardous Materials

- Contaminated soils identified within proposed areas of soil cut would be carefully removed, transported, and deeply buried in locations of proposed fill, in accordance with applicable federal and District of Columbia regulations for handling contaminated materials.
- Excavated soil requiring removal to an offsite remediation and disposal facility would be coordinated with the DCRA, the DCRA Environmental Regulation Administration, and the Public Space Maintenance Administration (PSMA). Contaminated soil would be properly treated and disposed of in an approved facility in compliance with federal and District guidelines. Overall, development of Alternative A would provide the opportunity to improve potential adverse soil characteristics at the Grounds created by historic filling operations.

Historic Resources

Pursuant to a Programmatic Agreement, the NPS would continue to consult with the District of Columbia Historic Preservation Office (DC-SHPO), ACHP, NCPC, and concurring parties to ensure that the undertaking will meet the Secretary of Interior's Standards for Rehabilitating Historic Structures and Cultural Landscapes.

- NPS will continue engineering design to ensure that excavation and construction through the foundation will be conducted without harm to the monument's integrity.
- The additions to the Monument Lodge will be installed in a manner that allows it to be reversible with minimum damage to the historic fabric of the structure.
- Rehabilitation of the Monument Lodge will be achieved in accordance with the Secretary of the Interior's Standards.
- Ground surfaces and planting materials will be of the highest quality and appropriate to the historic precedents.

Staff finds the mitigation actions are sufficient, except as noted by the staff's remarks above, to meet the objectives of minimizing or eliminating potential environmental consequences of the proposed action.

Public Comment on the EA

The Commission has received limited direct comments concerning the EA. As the lead federal agency, NPS has provided copies of the comments (approximately 53) submitted to them from

the commentary on the EA during the extended review period that closed June 21, 2002. In summary, the following main themes of the public review period indicated:

- Although there was sufficient interest expressed about the de-stabilization of the monument, many expressions demonstrated misunderstanding of the alternatives and their exact dimensions, location, or intent.
- At least five commenters indicated the lack of sufficient detail, the identification of other alternatives, or the need for further analysis within the EA and requested the further preparation of a formal Environmental Impact Statement (EIS).

The National Coalition to Save Our Mall submitted a letter on June 17, 2002, that the alternatives discussed in the EA were not varied and reflective of the plans or ideas suggested by various comments provided during the Section 106 Programmatic Agreement meetings. Additionally, the remarks of the letter assert the following, which were common points made by commenters:

- The EA does not adequately identify historic properties affected.
- The EA does not identify the project's design and misrepresents the design.
- The EA does not identify and analyze physical, cultural and visitor impacts, including regulations intended to treat mobility-impaired persons.

The Coalition letter referenced twenty-two other specific concerns of the NPS NEPA document.

The Commission staff believes the document presents information that reflects a level of data adequate for Commission use and that meets the goals of the NEPA process as required by the Council on Environmental Quality (CEQ). Moreover, as the CEQ stresses, the document is to serve as an informational gathering effort that should not duplicate detailed analysis. As stated in its guidance issued to agencies in 1981, "since the EA is a concise document, it should not contain long descriptions or detailed data which the agency may have gathered. Rather, it should contain a brief discussion of the need for the proposal, alternatives to the proposal, the environmental impacts of the proposed action and alternatives, and a list of agencies and persons consulted. Section 1508.9(b)." ¹

No argument by the Coalition addresses a contention of alternative use of resources, only the method or design of the planned use. Further, the contention that the severity of an impact exists does not make it fact. There is no presentation of any suspected information demonstrating unresolved adverse impacts on resources, but only conjecture of occurrences, the identified effects, or the perceived lack of information and suspicious intent, concerning an issue. However, the EA does present definitive mitigation statements regarding potential effects. Consequently, the staff finds the arguments of insufficiency, as a whole, unsubstantiated. Commission staff finds the analysis and EA record does include sufficient information to allow

¹ Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations --This memorandum was published in the Federal Register and appears at 46 Fed. Reg. 18026 (1981). March 16, 1981.

decision makers to review the potential environmental effects of the proposed alternatives, and to understand the significance of their potential impacts.

Other issues identified during public review of the EA included the following general areas:

- Several visitor screening and vehicle barrier improvements were considered as alternatives by NPS and are discussed within the EA as “alternatives considered but eliminated” at Section 3.5 of the EA. Additionally, review by NPS has been accomplished on other alternatives that include:
 - Visitor screening facility internal to the monument that comprises of an opening placed in the west wall of the monument.
 - Visitor screening with an underground facility at the monument base area.
 - Visitor screening at the entrance to the existing monument entrance.
 - Vehicle Barrier using bollards internal to the Monument Grounds.
 - Visitor access by shuttle between a proposed underground visitor facility and the existing monument.
- NPS, in its development of a final NEPA determination, cites that it has considered the implications of the full range of alternative improvements suggested by the EA process. These include the aspects of:
 - Visitor screening and its options
 - A Vehicle barrier and its options
 - Access to the monument for screened visitors and its options
 - Grounds improvements
 - Consideration of additional technical information. Preparation of the EA was conducted in full coordination with the professional engineering and design teams performing the specific and detailed technical studies of geology, soils engineering, and structural foundation analysis. Preliminary data and analysis was available and utilized in the EA. The refined information now presented by the teams supports and furthers the level of analysis information presented in the EA. The available studies include:
 - Subsurface Investigation, Monument Grounds and Visitor Facility, Washington Monument, Washington, DC produced by Mueser Rutledge Consulting Engineers on June 10, 2002. This data presents the same information to an extended and additional detail as that appearing in the EA. Furthermore, the report presents recommendations to be used in the final design and implementation of the structural and landscape improvements to the Monument Grounds. The information is similar and

in keeping with the detailed recommendations from the Mueser Rutledge 1973 report presented in the EA.

- A July 2002 peer review report of the foundation issues presented by the above structural engineering report. The peer review, which was completed in late July, was further reviewed by the project engineers, and responded to clarifying points of soil pressure loading by the various elements of the proposed design. The findings of the final peer review of October 30, 2002, concluded the initial structural analysis and soil engineering design conclusions for the project are valid and that differential rebound to the monument foundation would be at approximately 0.0024 inches. Six recommendations of the peer report have been incorporated into the project preliminary design process and will be further implemented in the final project design and construction.
- Perceived safety and security inadequacies. NPS in responding to the expressed comments of inadequate security implications of the proposal requested the U.S. Park Police, in consultation with the U.S. Secret Service, the Department of State, Booz Allen Hamilton, and Applied Research Associates to fully review and identify the goals of the proposed Monument Grounds and Visitor Facility proposal. Those goals are:
 - Screening visitors at a remote location away from the monument to create maximum distance between the first interaction with security personnel and the monument.
 - Delivering screened visitors to the monument in a manner that does not allow interaction with unchecked individuals to prevent the illegal transfer of weapons or explosives into the monument.
 - Preventing vehicles from approaching the monument to preclude the transport of large loads of explosives to the structure itself.
- The identified objectives of the U.S. Park Police serve as a benchmark for analysis of security issues in recognizing that this entity is responsible for security performance and protection activity for federal monuments under the management of NPS. In the context of the objectives, the proposed solutions meet the objectives of:
 - Effectively protecting the structural integrity of the monument.
 - Physically removing visitor screening to the maximum distance from the monument.
 - Separation of screened visitors from contact with unscreened individuals.

Construction and operation of the Washington Monument Grounds Revised Concept and Visitor and Security Improvements would not have a significant adverse impact on the natural environment, socio-cultural resources, transportation, parking, or utilities systems. Construction activities would have minor adverse effects on noise, the visual environment, vehicular traffic,

pedestrian traffic, and parking; however, these effects would be of short duration and would not result in long-term effects on these resources. This conclusion has been arrived at in considering not only the NPS developed EA but also the subsurface investigation information compiled by NPS project consultants in May 2002 and information provided to NCPC in late August and November 2002. All information in the EA, as independently reviewed by NCPC staff, has been determined to adequately address the environmental issues and impacts of the proposed project.